

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re:

Moshe Gold,

Alleged Debtor.

Involuntary Chapter 11

Case No. 24-43647 (NHL)

[PROPOSED] ORDER DISMISSING CASE

Upon the motion (the “Motion”) of the above-captioned alleged debtor (“Gold”) pursuant to 11 U.S.C. § 303 and Federal Rule of Bankruptcy Procedure Rule (“Bankruptcy Rule”) 1011(b), and E.D.N.Y. Local Bankruptcy Rule 1013-1(c) for entry of an order: (i) dismissing the involuntary petition; (ii) awarding Gold costs and attorneys’ fees pursuant to 11 U.S.C. § 303(i)(1); and (iii) awarding Gold punitive damages pursuant to 11 U.S.C. § 303(i)(2), all as more fully set forth in the Motion; and the court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; the Court having found this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), the Court may enter a final order consistent with Article III of the United States Constitution; the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; the Court having considered the statements of counsel in support of the Motion and the Declaration of Moshe Gold filed in support of the Motion; and notice of the Motion was good and sufficient under the circumstances; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion [ECF No. ____] is GRANTED as set forth below.
2. The above-captioned case is hereby dismissed.

3. Gold is entitled to attorneys' fees and costs pursuant to 11 U.S.C. § 303(i)(1). Gold shall submit a motion for attorneys' fees and costs, supported by appropriate documentation, within 14 days after the entry of this order. Any objections shall be filed within 7 days after service of the motion. The Court will determine the amount of attorneys' fees and costs to be awarded after considering Gold's motion and any objections.

4. Gold is entitled to punitive damages pursuant to 11 U.S.C. § 303(i)(2) in the amount of \$_____. The Court directs Yoel Abraham to remit the full amount of the punitive damages within 30 days after the entry of this order.

5. Notwithstanding any provisions in the Bankruptcy Code, the Bankruptcy Rules, or the Local Bankruptcy Rules to the contrary, this order is immediately effective and enforceable upon its entry.

6. Gold is authorized to take all actions necessary or appropriate to effectuate the relief granted in this order in accordance with the Motion.

7. This Court retains jurisdiction and power to hear and determine all matters arising from or related to this order.